IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.,) CASE NO. 1:08-CV-2755
Plaintiff,) JUDGE LESLEY WELLS
v.) MOTION FOR EXTENSION OF TIME TO
) RESPOND TO THE SAP DEFENDANTS'
SAP AMERICA, INC., et al.) "MOTION TO PRECLUDE INADMISSIBLE
) LAY OPINION TESTIMONY"
Defendants.	

Plaintiff Hodell-Natco Industries, Inc. ("Hodell"), through undersigned counsel, requests leave to respond to the SAP Defendants' "Motion to Preclude Inadmissible Lay Opinion Testimony" filed April 13, 2015. [ECF #304]. Out of an abundance of caution, and to prevent any confusion regarding the due date for Hodell's Opposition, Hodell requests until May 1, 2015 to file its Opposition Brief. This is the same amount of time Hodell would be afforded under Local Rule 7.1(d) for filing oppositions to non-dispositive motions.

In support of this Motion, Hodell states that SAP has filed an almost thirty (30) page "motion *in limine*" accompanied by twenty-two (22) footnotes, one appendix and twelve (12) exhibits, and is in excess of the page limitations for non-dispositive motions.

The issues addressed in SAP's Motion are obviously of great importance, and Hodell should be afforded, at a minimum, the time permitted under the Local Rules to respond.

Accordingly, Hodell requests leave until May 1, 2015 to respond to SAP's "Motion to Preclude Inadmissible Lay Opinion Testimony."

Dated: April 20, 2015 Respectfully submitted,

/s/ P. Wesley Lambert

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CERTIFICATE OF SERVICE

The undersigned certifies that on April 20, 2015, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the document through the Court's electronic filing system.

/s/ P. Wesley Lambert

P. Wesley Lambert, Esq. (0076961) Attorney for Plaintiff Hodell-Natco Industries, Inc.